CARDD

MEPA ROUTING MEMO

To: Mark Bostrom

Through: Autumn Coleman

From: Demi Blythe

Re: Cut Bank Water System Improvements Adoption MEPA Decision

Project Sponsor: City of Cut Bank

Name of Project: Cut Bank Water System Improvements Phase 4

Agreement No: RRG-20-1712

Memo:

DNRC can issue a Final Adoption Notice for the Montana Department of Environmental Quality's (DEQ) Categorical Exclusion of the Cut Bank Water System Improvements – Phase Four Project (attached). **SIGNATURE REQUIRED**

___/s/DEB___ MEPA/NEPA Coordinator Review

_____ Bureau Chief Review

_____ Division Administrator Signature

_____ Post for _30_ Days on DNRC's Environmental Docs page.

_____ File

NATURAL RESOURCES
AND CONSERVATION

GREG GIANFORTE, GOVERNOR
1539 ELEVENTH AVENUE

STATE OF MONTANA

DIRECTOR'S OFFICE: (406) 444-2074
FAX: (406) 444-2684
PO BOX 201601
HELENA, MONTANA 59620-1601

DECISION NOTICE
ADOPTION OF EXISTING ENVIRONMENTAL REVIEW

Cut Bank Water System Improvements Phase 4
September 2021
City of Cut Bank
48.63304, -112.326162
Glacier County

Existing Environmental Review Document: Montana Department of Environmental Quality Categorical Exclusion

Type and Purpose of Action

The City of Cut Bank is in northwestern Montana, approximately 30 miles from the Canadian border and 50 miles east of Glacier National Park. Cut Bank is the county seat for Glacier County.

Historical Information

The water system serving the City of Cut Bank (City) dates to approximately 1914. At that time the water distribution system primarily consisted of galvanized and cast-iron pipe. Water rights on Cut Bank Creek also date back to 1914. In 1935, a one-million gallon buried concrete tank with a wood frame roof was constructed on Tank Hill. A well was added in 1940 but was later abandoned in 1963 due to pump and valve problems related to mineralization. The existing water treatment plant was built in 1950, using contact stabilization and rapid sand filtration. In 1975, the system was converted to conventional flocculation, sedimentation, and rapid sand filtration. Water supply intake improvements were also made in 1975. A booster station to serve the higher elevation areas of the City was added in 1962. A one-million-gallon steel water storage tank was added in 1975 to assist in maintaining pressures for the booster pump service area and to provide fire flows to this area. The City has repaired the 1935 water storage tank by rehabilitating the concrete and constructing a new roof.

Cut Bank is one of 22 Participating Systems with the Rocky Boys/Northcentral Regional Water Authority. Under the Authority, a water transmission main (16-inch - 18-inch PVC) from Shelby to Cut Bank was completed in the summer of 2017 to provide an interim water source to supplement Cut Bank's existing supply. Under the interim supply agreement Cut Bank may receive up to 0.75 MGD of groundwater from Shelby.

The City's 2006 Water System Preliminary Engineering Report (PER) identified approximately 90,000 lineal feet of water main that had exceeded its service life and needed to be replaced. It was recommended the City begin replacing the highest priority pipe, in a phased approach. Since 2010 Cut Bank has installed approximately 14,000 feet of new pipe in two phases A third phase will be constructed in the summer of 2018 that will replace an additional 8,800 lineal feet of water main.

The 2018 PER is an update to the 2012 PER and 2016 PER with new water system data and City information. The two previous PER's are incorporated into the 2018 Update by reference, and if not specifically updated or supplemented, the information in each document continues to be applicable and is intended to support the conclusions, implementation plan, and funding strategy presented the 2018 PER Update. The 2018 PER Update only provides new information or updates information as appropriate and does not repeat already accurate data. The two previous PER's are attached as Part 4 of this application.

Problem

The majority of the City's distribution system piping was constructed in 1914 and has had limited upgrades since then. Approximately 40% of the pipe is 4-inches in diameter or smaller and is badly corroded. Heavily corroded pipelines encourage the growth of biofilm that harbors bacteria and makes it difficult to maintain adequate chlorine residual in the distribution system. Such a condition presents a public health concern. The pipe corrosion also inhibits flushing velocities and minimizes the effectiveness of flushing efforts, further inhibiting efforts to remove existing biofilm.

At over 100 years old, and based on its current performance and condition, much of the 4-inch and smaller cast iron and galvanized pipe is beyond its useful service life and should be replaced. Because of problems with maintaining minimum static pressures during fire flow events in 4-inch mains, DEQ requires the minimum pipe size for systems with fire protection is 6-inch diameter. Hydraulic analysis has shown much of the system to have deficient fire flow, which represents a critical public safety concern. The inability to control fires puts the firefighters at greater risk.

Leakage in the distribution system is very high (approximately 86 million gallons/ year) and the frequency of repair is also very high compared to other communities. Low pressures in portions of the distribution system could result in backflow, back-siphonage, and backpressure of contaminants entering the distribution system through cross-connections.

The 1 MG steel water storage tank was last repainted in 2002. The tank is in fair condition but needs to be recoated on both the interior and exterior to extend its service life.

Proposed Solution

The proposed project is to replace approximately 5,200 lineal feet of undersized and aging cast iron water main in the commercial area along Central Avenue and in some residential areas. This is a fourth phase of a phased approach to replacing portions of the distribution system. The City has completed distribution system improvement projects in 2009 and 2010 and will be completing a third phase in the summer of 2018. The City has identified the fourth phase of improvements as the next priority. The 1 MG steel water storage tank will be sandblasted and a new epoxy coating system will be applied to both the interior and exterior of the tank. Construction will begin September 2021.

Explanation of the decision(s) that must be made regarding the proposed action (i.e. approve grant or loan and provide funding):

DNRC approved the loan and grant to provide funding for the City of Cut Bank Water System Improvements Phase 4 Project.

Criteria for Adopting Existing Environmental Review

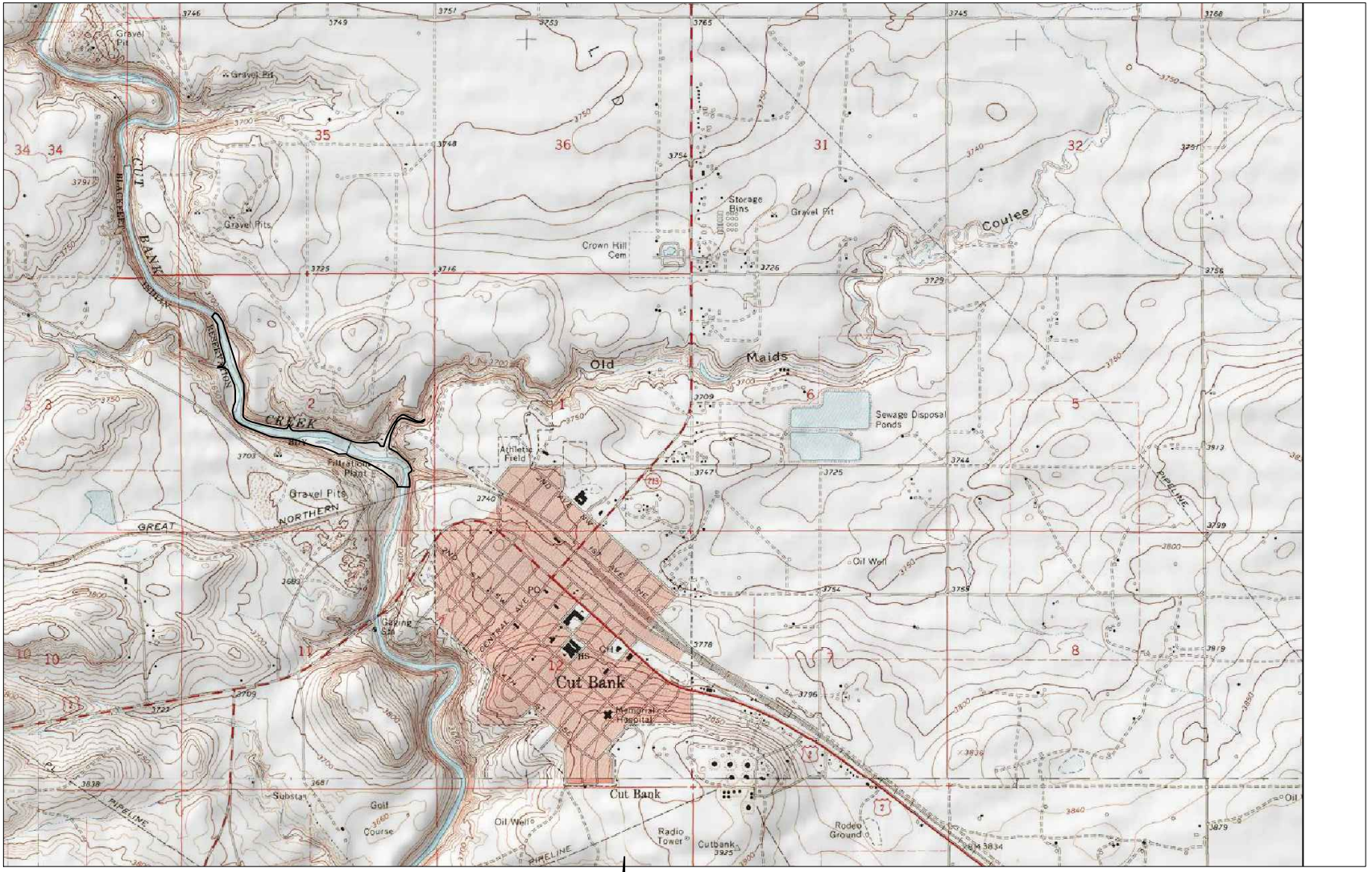
☒The existing environmental review covers an action paralleling or closely related to the proposed action.

☒The information in the existing environmental review is accurate and clearly presented.
☒The information in the existing environmental review is applicable to the action being considered.
☒All appropriate Agencies were consulted during preparation of the existing environmental review.
☒Alternatives to the proposed action evaluated as part of the existing environmental review effort.
☒The impacts of the proposed action been accurately identified as part of the existing environmental review.
☒The existing environmental review identifies any significant impacts as a result of the proposed action and those identified will they be mitigated below the level of significance.

Adopt
The existing environmental review can be considered sufficient to satisfy DNRC's MEPA review responsibilities. No further analysis needed.

Existing Analysis Prepared By:	**Name:** Demitra Blythe	**Date:** 8/28/2021
	Title: CARD Division MEPA/NEPA Coordinator	
	Email: Demitra.Blythe@mt.gov	

Approved By:	Name: Mark Bostrom	
	Title: CARD Division Administrator	
Signature:	DocuSigned by: Mark W Bostrom BF7A1C50B2AF4DE...	**Date**: 8/31/2021



0 1000 2000
SCALE IN FEET

NORTH

GreatWest engineering

Figure 2-1
CUT BANK VICINITY
USGS QUAD TOPOGRAPHIC MAP

CITY OF CUT BANK
WATER PRELIMINARY ENGINEERING REPORT

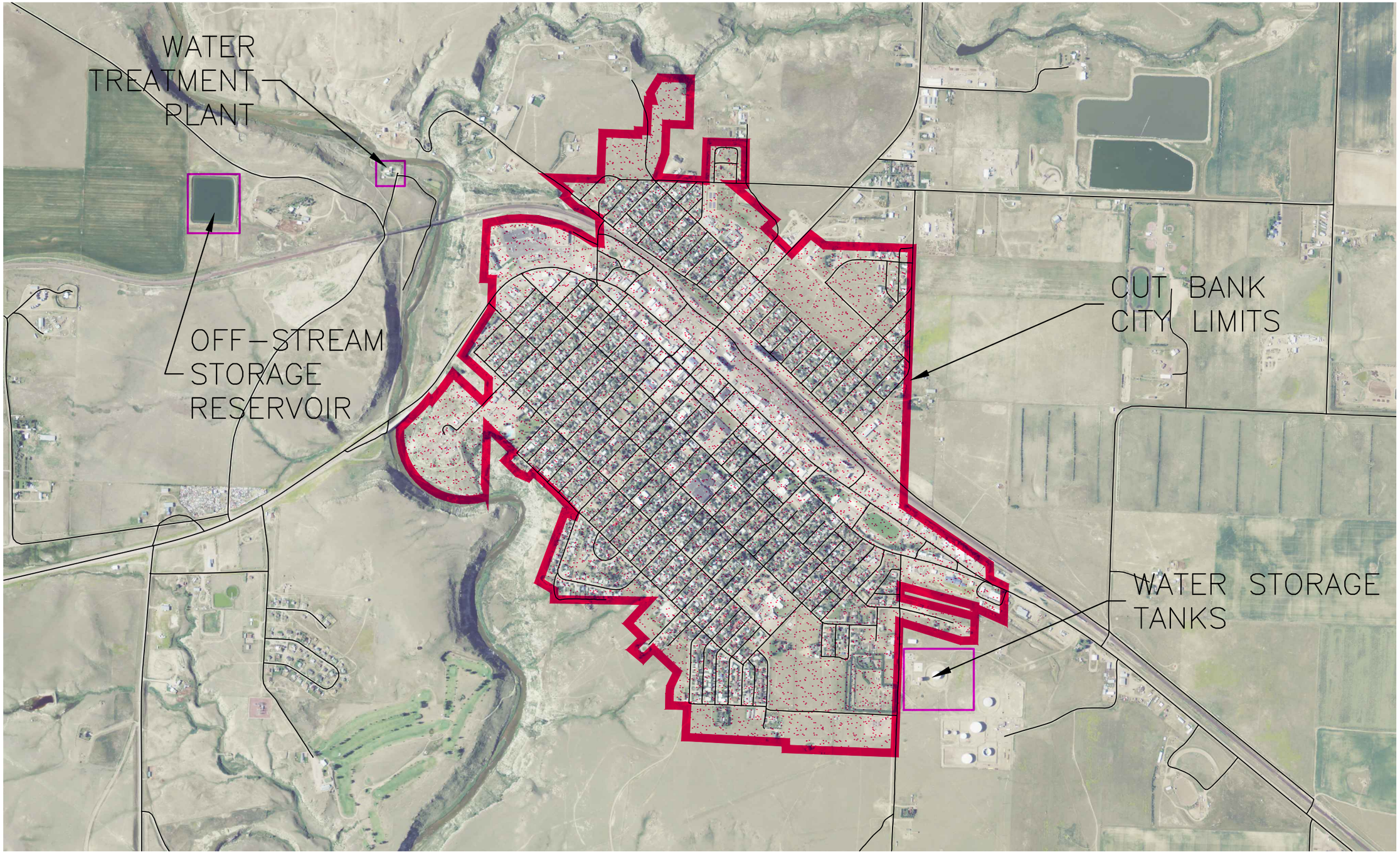


Figure 2-2
Project Planning Area

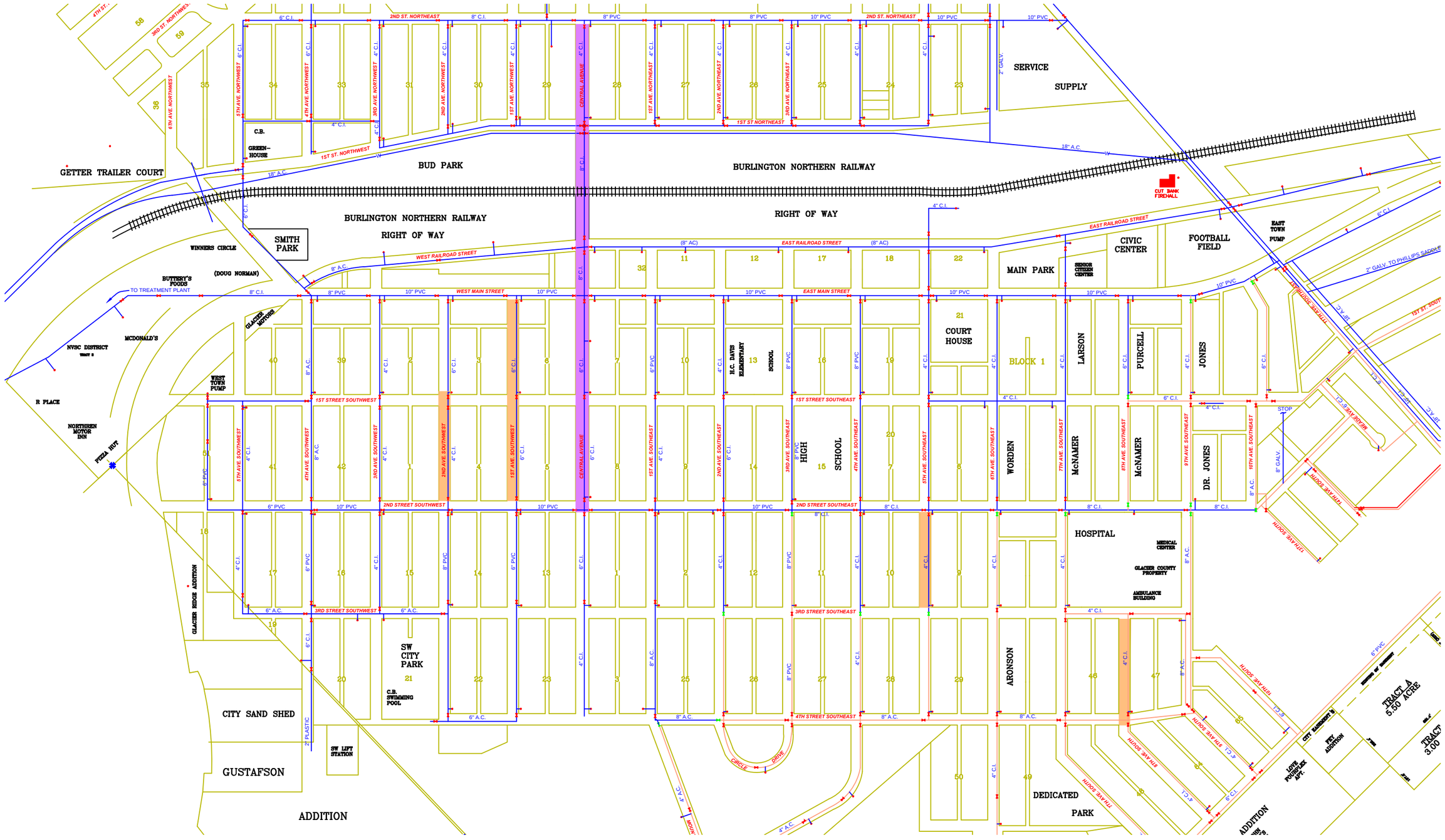


Figure 5-1
Phase 4 Distribution System Improvements

CITY OF CUT BANK

F:\1-14247-Cut Bank On-Call 2014\TO 5 - Water System PER\CADD 1-14247-T05\Exhibits\1-14247-T05-Phase 4 Distribution System Improvements.dwg

July 17, 2020

Dan Raemaeker, Mayor
City of Cut Bank, Montana
221 W. Main Street
Cut Bank, MT 59427

RE: Categorical Exclusion – City of Cut Bank, Montana
Phase 4 Water System Improvements Project (EQ No. 20-2388)

Dear Mayor Raemaeker:

An environmental review of the above referenced project has been completed by the Drinking Water SRF Program. Based on this review, it has been determined that the project is eligible for a categorical exclusion from further environmental review. A copy of the Notice of Publication of Categorical Exclusion for this project is enclosed. Please print the notice in at least one publication of your local newspaper, under legal advertising, and return a copy of the proof of advertisement to this office. Please have the notice, Preliminary Engineering Report (PER) and the project contract documents available for public review at your office. We have distributed the notice to the enclosed list of agencies. If you have any questions regarding this process or the project in general, you can call me at 444-5316.

Sincerely,

Robert Ashton
State Revolving Fund Loan Program
Engineering Bureau
rashton@mt.gov
406.444.5316

Encl

cc: Joel Pilcher, Great West Engineering, Helena, MT
Anna Miller, DNRC (w/o notice)

DEQ
Montana Department of Environmental Quality

Memorandum

To: Rob Ashton, Engineering Review Bureau
From: Carolyn DeMartino, Water Quality Division
Date: July 8, 2020
Re: Cut Bank Water Treatment System Improvements Project Potential Contaminant Source Review

Based on the review conducted by Source Water Protection staff and the Remediation and Waste Management Division (RWMD) staff, one potential contaminant source (PCS) was identified within the proposed Cut Bank Water Treatment System Improvement Project Areas (Figure 1; Attachment A). The PCS is the Tank Hill Facility. Kate Fry, DEQ's Senior Environmental Project Officer for this State Superfund Site, provided the following information:

> *"The attached figure is from the approved remedial investigation report for the Tank Hill Facility (EHS 2017) and shows the approximate extent (at the time the RI was prepared) of light non-aqueous phase (LNAPL) in the upper water bear zone. Areas shaded in purple on the attached figure are approximate locations of proposed water main replacements that are in areas or adjacent to areas of contamination associated with the Tank Hill Facility. The locations are based the figure included in your July 2nd email.*
>
> *The proposed water tank is adjacent to the Tank Farm property which is the source of contamination for the Tank Hill Facility. More specifically, the proposed water tank is adjacent to spill area 5 (SP 5) which has documented soil contamination greater than DEQ risk-based screening levels (RBSLs) for petroleum hydrocarbons. Contaminated soil may be encountered during construction activities associated with the proposed water tank. Depth to groundwater (based on historic groundwater measurements from CB-83, CB-84, and CB-7) is greater than 60 ft below ground surface (bgs) and groundwater is not expected to be encountered during construction activities.*
>
> *The proposed water main replacement along 5th Ave SE is adjacent to contaminated groundwater (e.g., LNAPL and petroleum hydrocarbon concentrations exceeding RBSLs. Based on historic groundwater measurements from CB-85 groundwater is expected to be about 20 ft bgs. Contaminated groundwater and/or soil may be encountered if excavation activities are greater than 10 feet.*
>
> *The proposed water main replacement along 8th Ave SE is not within an area of soil contamination or groundwater contamination. Based on historic groundwater measurements from CB-52, CB-53, and CB-79, groundwater is expected to be greater than 50 ft bgs.*

The proposed water main replacements along 1st Ave SW, 2nd Ave SW, and Central Ave are not within an area of soil or groundwater contamination from the Tank Hill Facility, and are not shown on the attached figure.

The proposed water tank and the proposed water main replacement along 5th Ave SE may encounter contamination. In addition, groundwater/soil sampling, groundwater treatment (dewatering), and soil disposal are considered remedial actions under CECRA. Therefore, a third party work plan would be required to conduct this work. (See http://www.deq.mt.gov/dir/legal/Title17.mcpx)

I previously worked with KLJ and Swank on the third party process during the sewer line replacement in Cut Bank."

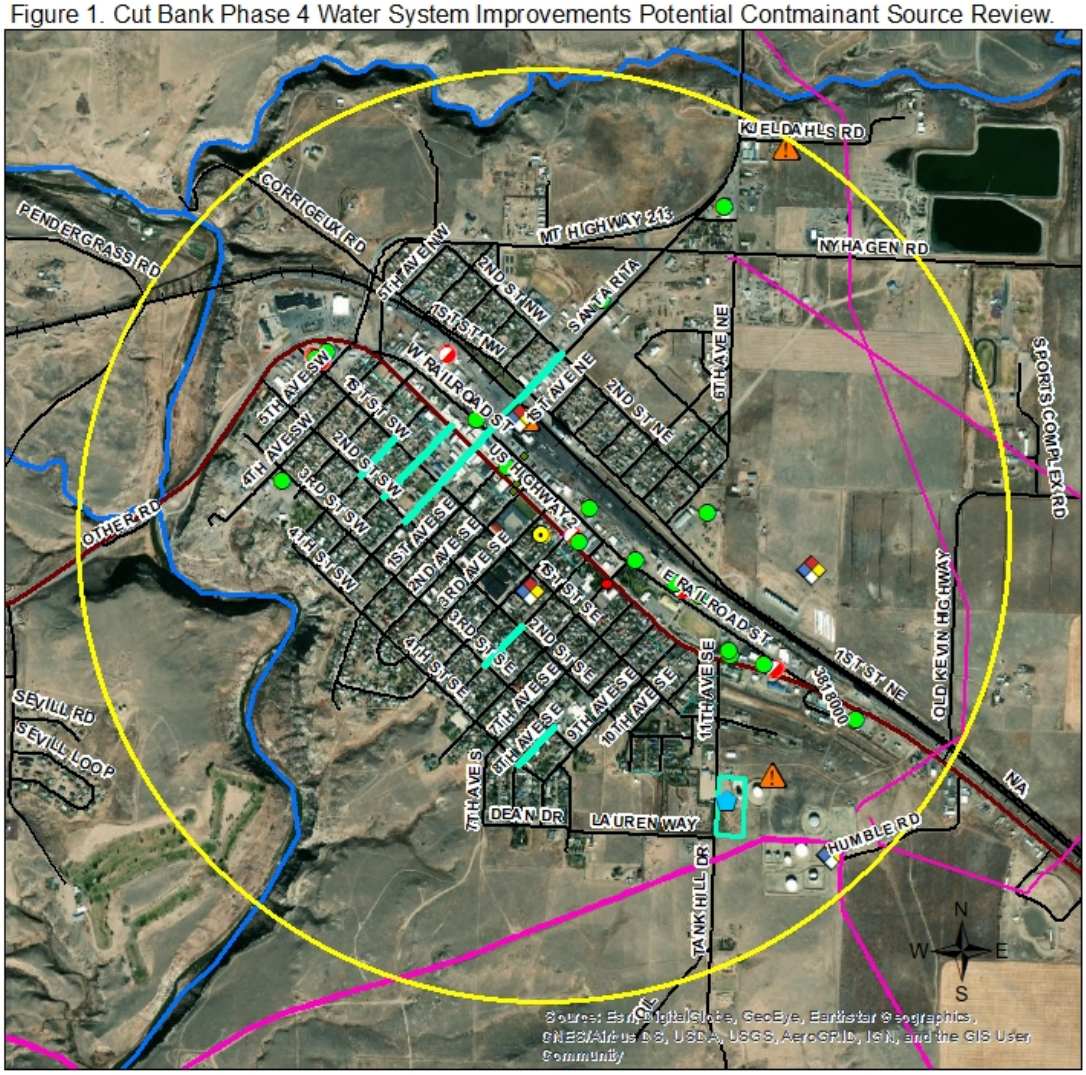
The PCS review included the use of DEQ's On-line Data Search Tool to determine if any of the following PCSs: State Superfund Sites, Federal Superfund Sites, Brownfields Sites, underground fuel storage tanks (USTs), active and abandoned mine sites, Montana Agricultural Chemical Groundwater Protection Act Sites, Water Quality Act Sites, landfills, transportation routes (roads/ railroads), petroleum pipelines, hazardous waste handlers, septic density, and wastewater discharge areas, are located within this project area.

Potential contaminant sources described above are identified from readily available information. Consequently, unregulated activities or unreported contaminant releases may have been inadvertently overlooked. The geographic location accuracy (street address, latitude & longitude) of all identified tank (UST & LUST) sites, if any, should also be verified by the user. The use of multiple sources of information, however, should ensure that the majority of potential contaminant sources were addressed by this review.

The contractor(s) for the Cut Bank Water Treatment System Improvements Project may encounter contaminated soil/ ground water. If contaminated soil and/ or ground water is encountered, the contractor should immediately stop excavation; and report the event to an actual person using the Montana Department of Environmental Quality Hot Line at: 1-800-457-0568; or after hours and holidays 1-406-324-4777. For contamination specifically related to the Tank Hill Facility; please contact Kate Fry at (406) 444-6426.

Thank you for giving me the opportunity to review this project. Please contact me if you have any questions regarding this memo.

Figure 1. Cut Bank Phase 4 Water System Improvements Potential Contmainant Source Review.



Scale

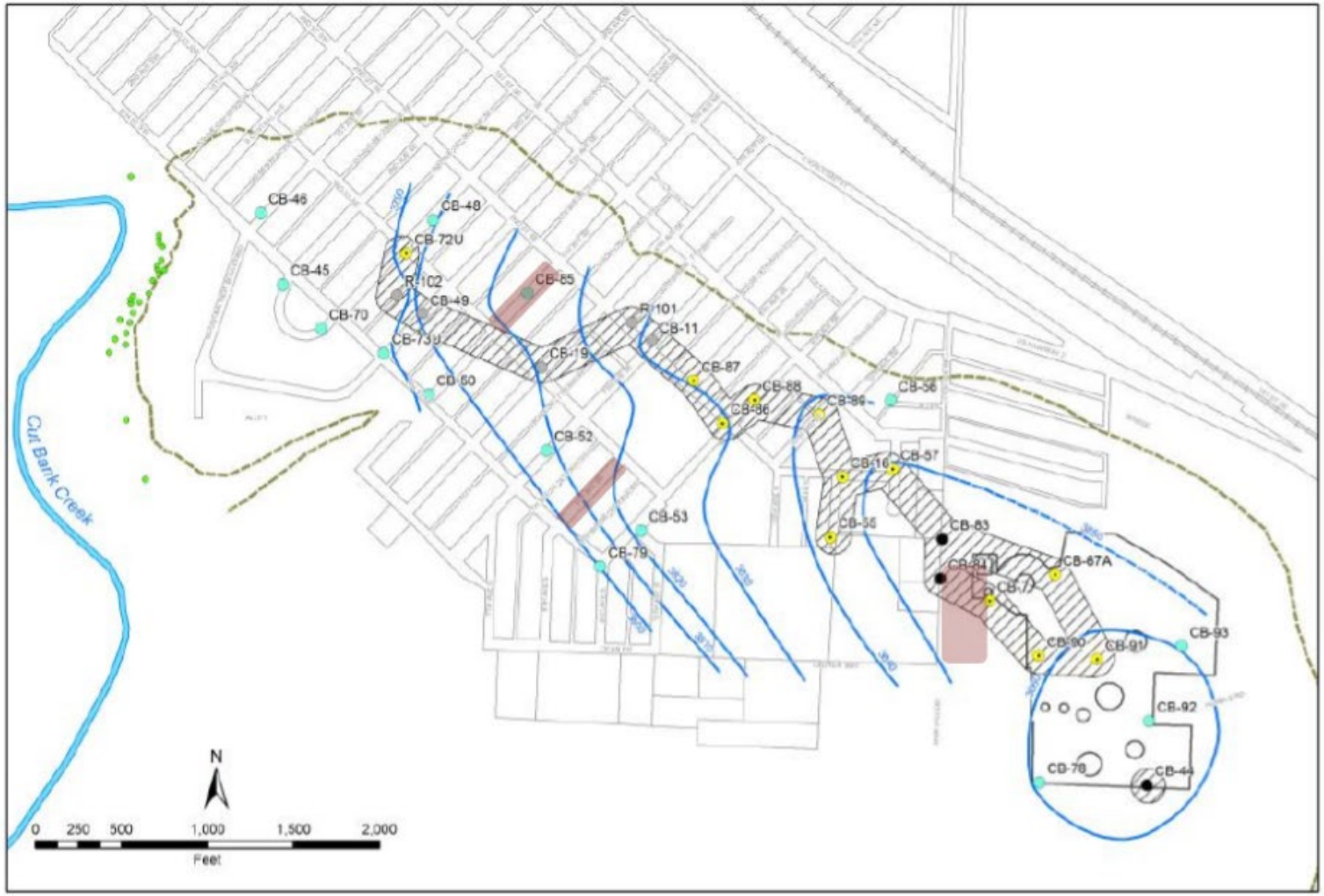
0.5 0.25 0 0.5 Miles

Legend

- Proposed Water Tank
- Proposed Water Main Improvements
- WaterTank Site Property
- 2-mile Diameter Project Buffer
- Buffer Centroid
- City-County Roads
- U.S. Highway 2
- BNSF Railroad
- Streams
- Inactive Petroleum Pipelines
- Hazardous Waste Handlers
- Remediation Response Sites
- UST - Currently in Use
- UST - Permanently Out of Use
- Other Leaking USTs
- Active Leaking UST Site
- Resolved Leaking UST Site

Mapping by Carolyn DeMartino, DEQ Water Quality Division, June 2020

A. LNAPL Distribution in the UWBZ *



*(Upper Water Bearing Zone)

NOTICE OF PUBLICATION OF CATEGORICAL EXCLUSION
CITY OF CUT BANK, MONTANA
PHASE 4 - WATER SYSTEM IMPROVEMENTS PROJECT

July 17, 2020

The Montana Department of Environmental Quality has reviewed the above-named project. The project consists of installing approximately 2,500 lineal feet of 8-inch PVC water main, 2,900 lineal feet of 6-inch PVC water main, and all associated valves, fire hydrants, fittings, service lines, service connections and asphalt replacement. The water distribution work will include approximately 135 lineal feet of jacking and boring operations. The project also includes the replacement of a one million-gallon steel water storage tank with a new one million-gallon prestressed concrete water storage tank with all associated site work, controls, telemetry, pipe, fittings and appurtenances. The new tank will be constructed adjacent to the City's existing tank off Eden Road. The proposed water distribution work will replace aging and undersized water mains along the following streets:

- 2nd Ave SW (between 2nd Street SW and 1st Street SW),
- 1st Ave SW (between 2nd Street SW and Main Street)
- Central Ave (between 2nd Street SW and 2nd Street NE)
- 5th Ave SE (between 3rd Street SE and 2nd Street SE)
- 8th Ave SE (between 4th Street SE and 3rd Street SE)

The project construction specifications note the potential to encounter petroleum contaminated soil or water within the project site and include language on the procedures to follow if this were to occur. Pursuant to ARM 17.40.318, the Department has concluded that the proposed project meets the Categorical Exclusion criteria of the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA). The Categorical Exclusion may be revoked if the project is not initiated within the time period specified in the planning documents, a new or modified application is submitted, or new evidence demonstrates serious local or environmental issues exist, or state, local, tribal, or federal laws are violated. The documentation for the Categorical Exclusion is available for public review at the following locations:

Department of Environmental Quality
State Revolving Fund Loan Program
1520 East Sixth Avenue
Helena, MT 59601

Cut Bank City Hall
221 West Main Street
Cut Bank, MT 59427

Sincerely,

Mark A. Smith, P.E., SRF Program Manager
Engineering Bureau
Water Quality Division
Montana Department of Environmental Quality

CHAPTER III – ATTACHMENT D

DOCUMENTATION OF CATEGORICAL EXCLUSION DETERMINATION CHECKLIST

Project Name / Brief Description: Cut Bank 4
Replace ~5,400 ft of main & construct a new tank

Project Number: EQ No. 20-2388

Date: July 13, 2020

Preparer: R. Ashton

The Department action under Title 75, chapter 5, part 11 and or chapter 6, part 1 or 2, MCA, is excluded from the requirement to prepare an environmental assessment (EA) or environmental impact statement (EIS) if the application for department review is for any of the following projects:

(a) Projects relating to existing infrastructure systems such as sewer systems, drinking water supply systems, and stormwater systems, including combined sewer overflow systems that involve:

[Answer yes or no. If all answers "no", an EA or EIS must be completed. If any answer is yes, skip to (b).]

YES 1. minor upgrading;

NO 2. minor expansion of system capacity;

YES 3. rehabilitation (including functional replacement) of the existing system and system components;

YES 4. construction of new minor ancillary facilities adjacent to or on the same property as existing facilities; or

NO 5. projects in unsewered communities involving the replacement of existing on-site systems, provided that the new on-site systems do not result in substantial increases in the volume of discharges or in loadings of pollutants from existing sources, and do not relocate existing discharges.

(b) A categorical exclusion may NOT be granted for a department action if:

[Answer yes or no. If all answers "no", skip to (c). If any answer is yes, an EA or EIS must be completed.]

No 6. the action would authorize facilities that will provide a new discharge or relocate an existing discharge to ground or surface waters;

No 7. the action would result in an increase above permit levels established for the facility under the Montana pollutant discharge elimination system or Montana ground water pollution control system for either volume of discharge or loading rate of pollutants to receiving waters;

No 8. the action would authorize facilities that will provide capacity to serve a population at least 30% greater than the existing population;

No 9. the action is not supported by the state, or other regional growth plan or strategy;

No 10. the action directly or indirectly involves or relates to upgrading or extending infrastructure systems primarily for the purposes of future development;

No 11. the department has received information indicating that public controversy exists over the project's potential effects on the quality of the human environment;

No 12. the department determines that the proposed project that is the subject of the state action shows some potential for causing a significant effect on the quality of the human environment, based on ARM 17.4.608, or might possibly affect:

(i) sensitive environmental or cultural resource areas; or
(ii) endangered or threatened species and their critical habitats.

(c) If the proposed project meets the conditions above in determining use of a CATEX, the reviewer will then complete items 13 - 17 as follows:

[Once all steps 1- 17 are complete, reviewer shall sign and date at bottom. If revocation becomes necessary, reviewer shall initiate an EA or EIS as appropriate.]

✓ 13. Project meets the above Categorical Exclusion criteria.

✓ 14. DEQ determination of Categorical Exclusion.

____ 15. DEQ distributes the Notice of Determination.

____ 16. Notice of Publication and cover letter (containing revocation language below) is delivered to recipient.

____ 17. Notice of Publication published in local newspaper by recipient and evidence of publication provided to reviewer.

(d) The department may revoke a categorical exclusion if:

[Only complete the steps below 18 – 21 if revocation of a previously implemented CATEX becomes necessary.]

____ 18. the project is not initiated within the time period specified in the facility plan, or a new or modified application is submitted;

____ 19. the proposed action no longer meets the requirements for a categorical exclusion because of changes in the proposed action;

____ 20. new evidence demonstrates that serious local or environmental issues exist; or

____ 21. state, local, tribal, or federal laws may be violated.

Robert Ashton 7/13/2020
STATE PREPARER

Mark A. Smith 7/14/20
STATE REVIEWER

COMPLETION DATE

19 South Central Ave. • P.O. Box 847 • Cut Bank, MT 59427
Telephone: (406) 873-2201
Fax: (406) 873-2443

Pioneer Press Cut Bank

City of Cut Bank
221 West Main Street
Cut Bank MT 59427

Invoice

P.O. Number	Date	Invoice #
	7/29/2020	L203101

Description	Amount
Legal Notice Advertising - notice of publication of categorical exclusion City of Cut Bank, Montana Phase 4 water system improvements project Published: July 29, 2020	52.00
	Total $52.00

AFFIDAVIT OF PUBLICATION

STATE OF MONTANA

ss.

County of Glacier

I, LeAnne Kavanagh, being duly sworn, deposes and says: That she is the Legals Editor of the *Cut Bank Pioneer Press*, a weekly newspaper of general circulation, printed and published in Cut Bank, Glacier County, Montana, and that the notice annexed:

Notice of Publication of Categorical Exclusion PHASE 4 - Water System Improvement Project

has been correctly published in the regular and entire issue of every number of said paper for one(1) consecutive issues, commencing on the 29th day of July, 2020 and ending on the 29th day of July, 2020.

LeAnne Kavanagh

Subscribed and sworn before me this 29th day of July A.D., 2020.

Dawn M. Texidor

DAWN M. TEXIDOR
NOTARY PUBLIC for the
State of Montana
Residing at Cut Bank, Montana
My Commission Expires
February 01, 2023

Pioneer Press Public Notice

Notice of Publication - Water System Project

NOTICE OF PUBLICATION OF CATEGORICAL EXCLUSION CITY OF CUT BANK, MONTANA

PHASE 4 - WATER SYSTEM IMPROVEMENTS PROJECT
July 17, 2020

The Montana Department of Environmental Quality has reviewed the above-named project. The project consists of installing approximately 2,500 lineal feet of 8-inch PVC water main, 2,900 lineal feet of 6-inch PVC water main, and all associated valves, fire hydrants, fittings, service lines, service connections and asphalt replacement. The water distribution work will include approximately 135 lineal feet of jacking and boring operations. The project also includes the replacement of a one million-gallon steel water storage tank with a new one million-gallon prestressed concrete water storage tank with all associated site work, controls, telemetry, pipe, fittings and appurtenances. The new tank will be constructed adjacent to the City's existing tank off Eden Road. The proposed water distribution work will replace aging and undersized water mains along the following streets:

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- 5th Ave SE (between 3rd Street SE and 2nd Street SE)
- 8th Ave SE (between 4th Street SE and 3rd Street SE)

The project construction specifications note the potential to encounter petroleum contaminated soil or water within the project site and include language on the procedures to follow if this were to occur. Pursuant to ARM 17.40.318, the Department has concluded that the proposed project meets the Categorical Exclusion criteria of the National Environmental Policy Act (NEPA) and the Montana Environmental Policy Act (MEPA). The Categorical Exclusion may be revoked if the project is not initiated within the time period specified in the planning documents, a new or modified application is submitted, or new evidence demonstrates serious local or environmental issues exist, or state, local, tribal, or federal laws are violated. The documentation for the Categorical Exclusion is available for public review at the following locations:

Department of Environmental Quality
State Revolving Fund Loan Program
1520 East Sixth Avenue
Helena, MT 59601

Cut Bank City Hall
221 West Main Street
Cut Bank, MT 59427

Sincerely,
Mark A. Smith, P.E.,
SRF Program Manager
Engineering Bureau
Water Quality Division
Montana Department of Environmental Quality

Publish: July 29, 2020
MNAXLP

Environmental Evaluation

1) *Provide a narrative evaluation of the potential environmental impacts for each project alternative, including the preferred alternative. Describe all available alternatives to remedy the problems to be solved, including the no action alternative. Environmental analysis of each alternative does not have to be as detailed as the analysis for the preferred alternative, but enough information must be provided to demonstrate that the alternatives were investigated. Use the checklist on the following pages as a guide in your consideration of environmental impacts.*

Reasonable alternatives to the project are discussed in detail in Chapter 5 of the PER and they are summarized here.

Storage Alternatives:

- No Action
- Recoat 1,000,000 million gallon steel water storage tank

Distribution System Alternatives:

- No Action
- Distribution System Replacement in Phases
-

The no action alternative would not have environmental impacts; however, it would not provide renewable resource benefits, and the selected storage and distribution system alternative will. There are no environmental impacts associated with either the storage or distribution alternatives. For the chosen distribution system alternative most of the impacted land has been disturbed previously as a result of street construction. There will be no changes in land use and no prime farmlands and/or wetlands will be impacted.

There is some work that will be necessary in the Montana Department of Transportation (MDT) right-of-way along Central Avenue. This work will also require crossing under the BNSF Railway right of way. Required Utility Occupancy permits will be obtained during the design phase of the project.

Correspondence from the State Historic Preservation Office (SHPO) states that a cultural resource inventory is unwarranted at this time. If it is determined that any structures of historical significance need to be altered, SHPO will be contacted to investigate the site.

For the selected storage alternative, the tank is existing and minimal disturbance to the surrounding area is anticipated. Dust mitigation may be required during abrasive blasting of the tank.

2) *Describe and document the environmental resources of the area affected. Include any environmental assessments or analyses previously completed in addition to the completed environmental checklist.*

Fugitive dust, as a result of construction will be controlled within the work areas. The Contractor will be required to have a water truck available for dust control prior to beginning construction tasks.

Temporary erosion and sediment control measures include the installation and maintenance of temporary structural control measures to reduce or eliminate the erosion of soil and transport of sediment off site as a result of construction activities. The project will comply with all County Noxious Weed Management requirements. The project will comply with all MDT and BNSF permit requirements, as well as the requirements of all other permits deemed necessary during design.

Essentially, all potential impacts of the proposed project are considered insignificant. Measures will be taken during construction to minimize noise, dust, and other nuisances that could result from the construction work. For further review, a copy of the Environmental Checklist is attached.

According to 75-1-201(1)(b)(iv) MCA, an EIS is a detailed environmental review that is required whenever an agency proposes a major action significantly affecting the quality of the human environment.

The proposed project will not significantly affect the quality of the human environment and therefore, an EIS is not required. It has been demonstrated that a mitigated environmental assessment is appropriate for the level of potential impacts that may be encountered during the course of the project. That is, all impacts of the proposed action have been accurately identified; all impacts will be mitigated below the level of significance, and, no significant impact is likely to occur.

3. Identify the sources consulted for the completion of the Environmental Evaluation. Sources may include studies, plans, documents, or the persons, organizations, or agencies contacted for assistance.

The Environmental Review was completed by Joel Pilcher, PE. Joel Pilcher is Professional Engineer in the State of Montana and has worked with and on behalf of the

City of City of Cut Bank. Mr. Pilcher is familiar with the project and is qualified to complete to environmental assessment.

In addition, the following agencies were consulted regarding the environmental impact of the project. See Appendix A of the 2018 Water PER for agency letters and responses.

- Department of Environmental Quality
- Department of Fish, Wildlife and Parks
- Department of Natural Resources and Conservation
- Glacier County Conservation District
- Glacier County Floodplain Administrator
- Department of Transportation
- State Historic Preservation Office
- US Fish and Wildlife Service
- US Army Corps of Engineers
- Natural Resource Conservation Service

In addition, the EA was presented at a public hearing on June 4, 2018 in Cut Bank at the Voter Center. The hearing was advertised in the Pioneer Press and the draft EA was available for public review in Cut Bank for two weeks prior to the public hearing. The City Council approved the EA at the hearing on June 4, 2018.